

United States District Court  
for the  
Southern District of New York  
Related Case Statement

---

Full Caption of Later Filed Case:

Syracuse Mountains Corporation

Plaintiff	Case Number
vs.	
Bolivarian Republic of Venezuela	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Neuhauser

Plaintiff	Case Number
vs.	20-cv-10342-AT
Bolivarian Republic of Venezuela	
Defendant	

## Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

The complaint in Neuhauser was filed on December 8, 2020. On February 9, 2021, the plaintiff filed a letter motion indicating that it intended to file an amended complaint within the next 30 days and, therefore, had not yet undertaken to serve the complaint. On the same day, the court ordered the plaintiff to file a letter updating the Court on the status of service by March 25, 2021.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This case, like Neuhauser, is a breach-of-contract action against the Bolivarian Republic of Venezuela involving the enforcement of sovereign debt obligations issued by Venezuela. This case and Neuhauser involve some of the same series of bonds, issued under the same agreements and with the same terms. As such, both actions will involve common issues of law and fact pertaining to Venezuela's defenses to enforcement of the debt. If these actions are not considered related, there is a risk that the parties could be subject to conflicting orders. Further, there could be a substantial duplication of effort and expense. Venezuela has recognized that enforcement actions against it for its sovereign debt are related by filing a statement of relatedness to that effect. See Statement of Relatedness, Pharo Gaia v. Bolivarian Republic of Venezuela, ECF No. 3, No. 19-cv-3123 (Apr. 8, 2019).

Signature: /s/ Nicolas Swerdloff

Date: March 29, 2021

Hughes Hubbard & Reed

Firm: \_\_\_\_\_